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Interim Final Rules for Group Health Plans and Health Insurance Issuers Relating to Dependent Coverage of Children to Age 26 Under the Patient Protection and Affordable Care Act

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General Comment

A concern I have is unintended consequences.

I am the benefit consultant for a group that covers children of the employee's dependent children. A 14 year old's pregnancy is a parent's nightmare. As the Interim Regs read all children would have to be treated equally. The employer does not want to pay for babies born to married 24 year olds, yet it appears to me that we can not differentiate these two situations. May I suggest allowing (not requiring) children of dependent children to be covered until the dependent child of the employee attains age 18 (or an age selected by the employer). In other words, allow the employer to select age limits as applies to covering children of dependent children, which is not required by any law in the first place.